

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

1201 NORTH MARKET STREET
P.O. BOX 1347
WILMINGTON, DELAWARE 19899-1347
(302) 658-9200
(302) 658-3989 FAX

ALEXANDRA M. CUMINGS
(302) 351-9248
(302) 425-4670 FAX
acumings@morrisonichols.com

June 12, 2024

BY E-FILING

The Honorable Jennifer L. Hall
United States District Court
for the District of Delaware
844 N. King Street
Wilmington, DE 19801

Re: *Freites, et al. v. Bolivarian Republic of Venezuela, et al.*
Case No. 1:23-CV-00989-JLH

Dear Judge Hall:

I write on behalf of Defendants PDV Holding, Inc., CITGO Holding, Inc. (f/k/a PDV America, Inc.), and CITGO Petroleum Corporation (together, the “CITGO Defendants”) regarding the letter Plaintiffs filed under seal yesterday, June 11, 2024 (D.I. 56). The CITGO Defendants received notice of the filing via ECF, but they have not yet received a copy of the letter and cannot access it through the electronic docket because it was filed under seal. Additionally, the CITGO Defendants still have not received a copy of Plaintiffs’ Emergency Motion filed on May 30, 2024 (D.I. 54), as explained in my May 31 letter to the Court (D.I. 55).

The CITGO Defendants therefore respectfully request a copy of both D.I. 54 and D.I. 56 and renew their request for an opportunity to respond to the Emergency Motion and, if appropriate, the letter filed yesterday.

Counsel are available at the convenience of the Court should Your Honor have any questions.

Respectfully,

/s/ Alexandra M. Cumings

Alexandra M. Cumings (#6146)